

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 4:16cr074-NBB

NATHANIEL BROWN, MD

DEFENDANT NATHANIEL BROWN, MD'S MOTION FOR CONTINUANCE

COMES NOW, Defendant Nathaniel Brown, M.D. ("Brown"), by and through his counsel of record, pursuant to Rule 12 of the Federal Rules of Criminal Procedure, and hereby respectfully moves the Court for a continuance of the trial setting in this matter on October 3, 2016. As grounds for this Motion, counsel submits as follows:

1. The Defendant is charged with six (6) counts containing one count of conspiracy and five counts of healthcare fraud in violation of 18 U.S.C. §§1347 and 1349. Dr. Brown appeared Mr. Brown appeared and was released on bond.

2. Discovery has been produced and is very voluminous. These documents need to be reviewed not only by counsel for Defendant but by prospective experts. Defendant's legal team needs more time to render effective assistance of counsel.

3. Defendant Brown acknowledges and waives his right to a speedy trial

4. This Motion is not made to harass this Court. It is in the interests of justice this motion is granted in that the ends of justice served by the granting of such continuance outweigh the best interest of the public and the Defendant in a speedy trial pursuant to 18 U.S.C. §3161(h)(8).

5. Defendant respectfully requests the Court waive any supporting Memorandum of Law requirements.

6. Assistant United States Attorney Clay Dabbs has indicated that he has no objections to this motion.

WHEREFORE, the Defendant, Nathaniel Brown, by and through counsel, respectfully files this motion to continue the trial setting from its current setting of October 3, 2016.

Respectfully submitted, this the 5th day of April, 2012.

Respectfully submitted,

NATHANIEL BROWN, MD

By: /s/ Terris C. Harris
Terris C. Harris, J.D., LL.M (MSB # 99433)

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Terris C. Harris, Attorney for Defendant Nathaniel Brown, here certify that I electronically filed foregoing Notice of Appearance with the Clerk of the Court using the EFC system which sent notification of such filing to all counsel of record.

This Friday, September 02, 2016.

/s/ Terris C. Harris

TERRIS C. HARRIS